COUNT 2

On or about April 15, 2025, in the District of Arizona, Defendant, JUAN ROBERTO ZUNIGA-BARRAGAN, knowingly did have in his possession goods and chattels of a value in excess of \$1,000.00, that is Nike shoes found in a van with Arizona License Plate RBA7GX, which had been stolen from a Burlington Northern Santa Fe train while moving in interstate commerce from the State of California to the State of Arizona, knowing said goods and chattels to be stolen.

In violation of Title 18, United State Code, Section 659.

A TRUE BILL

FOREPERSON OF THE GRAND JURY Date: May 13, 2025

TIMOTHY COURCHAINE United States Attorney District of Arizona

RYAN MCCARTHY
MARIA R. GUTIERREZ
Assistant U.S. Attorneys